

LATHAM & WATKINS LLP
Douglas E. Lumish (SBN 183863)
doug.lumish@lw.com
Gabriel S. Gross (SBN 254672)
gabe.gross@lw.com
Arman Zahoory (SBN 306421)
arman.zahoory@lw.com
Rachel S. Horn (SBN 335737)
rachel.horn@lw.com
140 Scott Drive
Menlo Park, California 94025
Telephone: (650) 328-4600
Facsimile: (650) 463-2600

Attorneys for Defendant and Counterclaimant Skyryse, Inc.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,
Plaintiff,
v
SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and
DOES NOS. 1-50,
Defendants.

SKYRYSE, INC.,
Counterclaimant,
v
MOOG INC.,
Counterclaim-Defendant

CASE NO. 2:22-cv-09094-GW-MAR

**DECLARATION OF KELLEY
STOREY IN SUPPORT OF
SKYRYSE'S MOTION TO
OVERRULE MOOG'S
OBJECTION TO SKYRYSE'S
DISCLOSURE OF
CONFIDENTIAL
INFORMATION TO VINCENT
SOCCI**

Discovery Cut-Off: April 12, 2024
Pre-Trial Conference: August 12,
2024; 8:30 a.m.
Trial: August 27, 2024

Hearing: June 28, 2023
Time: 8:30 a.m.
Judge: Hon. Margo A. Rocconi
Location: Courtroom 790, 7th Floor

1 I, Kelley Storey, hereby declare and state as follows:

2 1. I am an attorney at Latham & Watkins LLP, counsel of record for the
3 Defendant and Counterclaimant Skyryse, Inc. in the above-titled action. I am over
4 the age of 18 years old. I have personal knowledge of the matters set forth herein
5 and if called as a witness, I could and would competently testify to all facts set forth
6 herein. I provide this declaration in support of Skyryse's Portions of the Joint Stip-
7 ulation re: Defendants' Motion to Enforce Order Compelling Trade Secret Identifi-
8 cation.

9 2. Attached hereto as Exhibit A is a true and correct copy of the parties'
10 correspondence regarding the disclosure of information designated as confidential
11 by Moog under the protective order to Vincent Soccia.

12 3. The parties participated in discussions regarding the disclosure of con-
13 fidential materials to V. Soccia from March 2 to March 30, 2023, and attempted to
14 resolve this dispute.

15 4. On March 14, 2023, the parties met and conferred to discuss Moog's
16 position that there is a significant risk of harm if materials Moog designated under
17 the protective order are disclosed to Soccia, after which the parties were still at an
18 impasse.

19 5. Attached hereto as Exhibit B is a true and correct copy of the parties'
20 correspondence with the Court regarding this dispute.

21 I declare under penalty of perjury that the foregoing is true and correct and
22 that this declaration was executed on May 25, 2023 in Washington, District of Co-
23 lumbia.

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Kelley Storey